

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

Stanley Lessington,	)	C.A. No.: 2:25-cv-6194-RMG-MGB
	)	
Plaintiff,	)	
vs.	)	
	)	<b>NOTICE OF REMOVAL</b>
	)	
City of Charleston,	)	
	)	
Defendant.	)	
_____	)	

TO: The Honorable Judges of the United States District Court for the District of South Carolina

Defendant City of Charleston (the “City”) hereby files this Notice of Removal to remove this action from the Court of Common Pleas for the Ninth Judicial Circuit for the State of South Carolina to this Court pursuant to 28 U.S.C. §§ 1331 and 1441(c). In support of this Notice, the City would show the following:

I.

On May 09, 2025, Plaintiff Stanley Lessington (“Plaintiff”) filed an action in the Court of Common Pleas for the Ninth Judicial Circuit, State of South Carolina, captioned “*Stanley Lessington v. City of Charleston*” and designated Case No.: 2025-CP-10-02700. On May 27, 2025, the City was served with the Summons and Complaint. A copy of the Summons and Complaint are attached hereto as Exhibit “A.”

II.

The action referred to in Paragraph I is a civil action over which this Court has original and removal jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 1441 (a) and (c). Specifically,

Plaintiff's Complaint alleges discrimination and retaliation under the Americans with Disabilities Act and Title VII of the Civil Rights Act.

III.

This Notice of Removal has been filed within thirty (30) days after the earliest date of service of the Summons and Complaint, and the time for filing this Notice of Removal pursuant to 28 U.S.C. § 1446(b) has not expired.

IV.

Written notice of the filing of this Notice of Removal will be promptly served on counsel for the Plaintiff.

V.

A true and correct copy of this Notice of Removal will be filed with the Clerk of Court of Common Pleas for the Ninth Judicial Circuit, State of South Carolina, as provided under 28 U.S.C. § 1446(d).

WHEREFORE, MUSC removes this action to this Court's jurisdiction.

s/ Bob J. Conley  
Bob J. Conley (FID #6791)  
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ATTORNEY FOR DEFENDANT

June 25, 2025  
Charleston, South Carolina

## **CERTIFICATE OF SERVICE**

This is to certify that I have this date caused to be served a copy of Defendant City of Charleston's Notice of Removal on counsel for Plaintiff by email and depositing same in the United States Mail, First Class postage prepaid, and addressed to:

Shannon Polvi  
Cromer, Babb, & Porter, LLC  
P.O. Box 11675  
Columbia, South Carolina 29211  
Telephone: (803) 799-9530  
[shannon@cromerbabb.com](mailto:shannon@cromerbabb.com)

*Attorney for Plaintiff*

s/ Bob J. Conley  
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ATTORNEY FOR DEFENDANT

June 25, 2025  
Charleston, South Carolina